

PATRICK J. JOYCE, ESQ.

Attorney at Law
70 Lafayette Street - 2nd Floor
New York, New York 10013
(212) 285-2299
FAX (212) 513-1989

November 2, 2022

VIA ECF

Honorable Richard M. Berman
District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re United States v. Wilfredo Rosado
Case No. 21-CR-00516-RMB-1

Your Honor,

I represent Wilfredo Rosado (“Defendant”) in the above-entitled case, and write to respectfully request an Order ordering the Bureau of Prisons to permit Defendant to use a discovery laptop at MDC for the purpose of reviewing the Government’s discovery and other legal materials so that he can assist counsel in his defense against the charges on which he is set to be tried in April 2023.

Defendant rarely if ever has access to the law library at MDC and has been repeatedly denied an opportunity to independently examine the Government’s discovery and other legal materials. In addition, because of the sensitive nature of the discovery in this matter, Defendant must be able to review said discovery in private—that is, in a room which is not shared and in which others are not looking over his shoulder.

Defendant’s family is willing to provide a laptop for this limited purpose. Obviously, the laptop will be subject to the Government’s inspection and approval, which should not be

unreasonably conditioned, delayed, or denied.

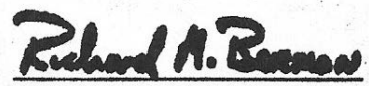
I have attached a Proposed Order for the Court's review and signature, which is derived from an Order recently signed by Judge Gardephe in [United States v. Saab, 2021 U.S. Dist. LEXIS 109443](#), 19 Cr. 676 (PGG) (SDNY June 4, 2021) and which granted the same relief requested herein.

Thank you for your consideration of this matter.

Respectfully submitted,

s/Patrick Joyce

CC: AUSA Matthew J. King
AUSA Madison Reddick Smyser
(VIA ECF)

Government to respond by 11/10/22.	
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SO ORDERED:	
Date: 11/7/22	
Richard M. Berman, U.S.D.J.	